To: Kelsi Feltz

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

From: Robyn Large, Federal Manager

Employer Services

Office of Child Support Services

Administration for Children and Families (ACF) Department of Health and Human Services

Date: January 2, 2024

Subject: Non-Substantive Change Request – National Medical Support Notice Part A (OMB #

0970-0222, expiration 11/30/2025)

This memo requests approval of a non-substantive change to the approved information collection, National Medical Support Notice Part A (OMB# 0970-0222, expiration 11/30/2025). Specifically, to add the option to exchange NMSNs electronically (e-NMSN record specifications).

Background

The Office of Child Support Services (OCSS) developed the National Medical Support Notice (NMSN) Part A as a standard, required form for child support agencies to use to ensure dependent children are enrolled in available employer-sponsored medical coverage, if required by a support order. The NMSN Part A was most recently approved on 11/22/2022 and the current expiration date is11/30/2025.

Currently, child support agencies download the paper NMSN form from the OCSS website, complete the form manually, and exchange NMSNs with employer partners by U.S. mail. Some states (e.g. TX) allow employers to retrieve the NMSN from their employer portal but there are not many states that do so. Currently, states send the completed NMSN to employers via U.S. mail, the employer responds to the state child support agencies by U.S. mail, and employers send the NMSN to their plan administrators, also by U.S. mail.

OCSS developed an electronic option for child support agencies to exchange NMSNs with employer partners. To exchange that information, OCSS created the e-NMSN record specifications to accompany the currently approved NMSN Part A. With the electronic e-NMSN process, states, employers, and plan administrators may exchange the documents electronically without using the U.S. mail, thereby saving time and mailing costs.

Overview of Requested Changes

Note that use of the e-NMSN electronic reporting process will **not** change any of the data elements collected under the currently approved NMSN Part A. Adding the newly developed e-NMSN record specifications to the NMSN Part A allows states and tribes to program their

systems to send the notice electronically to employers participating in e-NMSN. The electronic process reduces the time for states and tribes to send and employers to receive and process medical support orders allowing coverage for children to begin much sooner.

This e-NMSN process is voluntary for all states, tribes, and employers.

The proposed e-NMSN process will require an initial estimated one-time programming cost of \$55,320 per state, tribe, and employer. Thereafter, there will be minimal to no programming costs for states, tribes, and employers. The states, tribes, and employers burden hours and costs for those choosing the e-NMSN process will be reduced substantially.

Currently, Supporting Statement A has been updated to include the e-NMSN option in the burden estimates and to reflect the estimated one-time programming costs. OCSS will monitor e-NMSN use, including time estimates to complete the processes. Based on the information gleaned, OCSS will update the burden estimates related to e-NMSN as needed in the 2025 request to renew approval of the NMSN Part A.

Users will gradually opt in to the e-NMSN process after OMB approval.